

# EXHIBIT F

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO**

JOSEPH ALLEN DAVIS, on behalf of  
himself and others similarly situated,

Plaintiff,

Case No.: 1:24-cv-00187-PAB

vs.

CLEAR HEALTH, LLC,

Defendant.

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**PLAINTIFF JOSEPH ALLEN DAVIS'S RESPONSE TO DEFENDANT CLEAR  
HEALTH, LLC'S FIRST REQUEST FOR ADMISSIONS**

**REQUESTS FOR ADMISSIONS**

1. Admit that You visited a website at the domain  
<https://jobs.theamericancareerguide.com> prior to September 7, 2023.

**RESPONSE:** Plaintiff DENIES.

2. Admit that You submitted Your information on a website at the domain  
<https://jobs.theamericancareerguide.com> prior to September 7, 2023.

**RESPONSE:** Plaintiff DENIES.

3. Admit that someone You know visited a website at the domain  
<https://jobs.theamericancareerguide.com> prior to September 7, 2023.

**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth  
of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES.

4. Admit that someone You know submitted Your information on a website at the domain <https://jobs.theamericancareerguide.com> prior to September 7, 2023.

**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES.

5. Admit that You visited a website at the domain <https://jobs.theamericancareerguide.com> on September 7, 2023.

**RESPONSE:** Plaintiff DENIES.

6. Admit that You submitted Your information on a website at the domain <https://jobs.theamericancareerguide.com> on September 7, 2023.

**RESPONSE:** Plaintiff DENIES.

7. Admit that someone You know visited a website at the domain <https://jobs.theamericancareerguide.com> on September 7, 2023.

**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES.

8. Admit that someone You know submitted Your information on a website at the domain <https://jobs.theamericancareerguide.com> on September 7, 2023.

**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES.

9. Admit that You visited a website at the domain <https://jobs.theamericancareerguide.com> on April 6, 2023.

**RESPONSE:** Plaintiff DENIES.

10. Admit that You submitted Your information on a website at the domain <https://jobs.theamericancareerguide.com> on April 6, 2023.

**RESPONSE:** Plaintiff DENIES.

11. Admit that someone You know visited a website at the domain <https://jobs.theamericancareerguide.com> on April 6, 2023.

**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES.

12. Admit that someone You know submitted Your information on a website at the domain <https://jobs.theamericancareerguide.com> on April 6, 2023.

**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES

13. Admit that You visited a website at the domain <https://jobs.theamericancareerguide.com> on April 13, 2023.

**RESPONSE:** Plaintiff DENIES.

14. Admit that You submitted Your information on a website at the domain <https://jobs.theamericancareerguide.com> on April 13, 2023.

**RESPONSE:** Plaintiff DENIES.

15. Admit that someone You know visited a website at the domain <https://jobs.theamericancareerguide.com> on April 13, 2023.

**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES.

16. Admit that someone You know submitted Your information on a website at the domain <https://jobs.theamericancareerguide.com> on April 13, 2023.

**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES.

17. Admit that You visited a website at the domain <https://jobs.theamericancareerguide.com> on May 9, 2023.

**RESPONSE:** Plaintiff DENIES.

18. Admit that You submitted Your information on a website at the domain <https://jobs.theamericancareerguide.com> on May 9, 2023.

**RESPONSE:** Plaintiff DENIES.

19. Admit that someone You know visited a website at the domain <https://jobs.theamericancareerguide.com> on May 9, 2023.

**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES.

20. Admit that someone You know submitted Your information on a website at the domain <https://jobs.theamericancareerguide.com> on May 9, 2023.

**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES

21. Admit that You visited a website at the domain <https://jobs.theamericancareerguide.com> on May 11, 2023.

**RESPONSE:** Plaintiff DENIES.

22. Admit that You submitted Your information on a website at the domain <https://jobs.theamericancareerguide.com> on May 11, 2023.

**RESPONSE:** Plaintiff DENIES.

23. Admit that someone You know visited a website at the domain <https://jobs.theamericancareerguide.com> on May 11, 2023.

**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES.

24. Admit that someone You know submitted Your information on a website at the domain <https://jobs.theamericancareerguide.com> on May 11, 2023.

**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES.

25. Admit that You visited a website at the domain <https://jobs.theamericancareerguide.com> on June 1, 2023.

**RESPONSE:** Plaintiff DENIES.

26. Admit that You submitted Your information on a website at the domain <https://jobs.theamericancareerguide.com> on June 1, 2023.

**RESPONSE:** Plaintiff DENIES.

27. Admit that someone You know visited a website at the domain <https://jobs.theamericancareerguide.com> on June 1, 2023.

**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES.

28. Admit that someone You know submitted Your information on a website at the domain <https://jobs.theamericancareerguide.com> on June 1, 2023.

**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES.

29. Admit that You visited a website at the domain <https://jobs.theamericancareerguide.com> on September 8, 2023.

**RESPONSE:** Plaintiff DENIES.

30. Admit that You submitted Your information on a website at the domain <https://jobs.theamericancareerguide.com> on September 8, 2023.

**RESPONSE:** Plaintiff DENIES.

31. Admit that someone You know visited a website at the domain <https://jobs.theamericancareerguide.com> on September 8, 2023.

**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES.

32. Admit that someone You know submitted Your information on a website at the domain <https://jobs.theamericancareerguide.com> on September 8, 2023.



**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES.

33. Admit that You visited a website at the domain <https://jobs.theamericancareerguide.com> on September 13, 2023.

**RESPONSE:** Plaintiff DENIES.

34. Admit that You submitted Your information on a website at the domain <https://jobs.theamericancareerguide.com> on September 13, 2023.

**RESPONSE:** Plaintiff DENIES.

35. Admit that someone You know visited a website at the domain <https://jobs.theamericancareerguide.com> on September 13, 2023.

**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES.

36. Admit that someone You know submitted Your information on a website at the domain <https://jobs.theamericancareerguide.com> on September 13, 2023.

**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES.

37. Admit that You use the Subject Number.

**RESPONSE:** Objection: Vague and Ambiguous. Subject to the foregoing, Plaintiff ADMITS he uses the Subject Number but DENIES he ever provided it to Defendant or Defendant's representative as part of consenting to be contacted by Defendant or Defendant's representative.

38. Admit that You used the Subject Number prior to September 7, 2023.

**RESPONSE:** Plaintiff objects to this request on the grounds that it is vague and ambiguous. Subject to and without waiving this objection, Plaintiff DENIES.

39. Admit that You are the subscriber of the Subject Number.

**RESPONSE:** Plaintiff objects to this request on the grounds that it is vague and ambiguous. Subject to and without waiving this objection, Plaintiff ADMITS he is the subscriber of the Subject Number but DENIES he ever provided the number to Defendant or Defendant's representative as part of consenting to be contacted by Defendant or Defendant's representative.

40. Admit that You were the subscriber of the Subject Number prior to September 7, 2023.

**RESPONSE** Plaintiff objects to this request on the grounds that it is vague and ambiguous. Subject to and without waiving this objection, Plaintiff DENIES.

41. Admit that someone You know used the Subject Number prior to September 7, 2023.

**RESPONSE:** Plaintiff lacks sufficient knowledge or information to admit or deny the truth of the matter stated in this Request for Admission. Therefore, Plaintiff DENIES.

42. Admit that someone You know is the subscriber of the Subject Number.

**RESPONSE:** Plaintiff DENIES that someone other than Plaintiff is the subscriber of the Subject Number.

43. Admit that You have used, written, or entered the e-mail address davislock1567@gmail.com in any application, form, submission, or otherwise prior September 7, 2023.

**RESPONSE:** Plaintiff ADMITS he has “used, written, or entered the e-mail address davislock1567@gmail.com in” an “application, form, submission, or otherwise prior September 7, 2023;” however, Plaintiff DENIES he ever used this email address on the specific site in question – <https://jobs.theamericancareerguide.com>.

44. Admit that on September 7, 2023 Your cellular service provider was Verizon.

**RESPONSE:** Plaintiff ADMITS.

45. Admit that You accessed the Internet in September 2023 using The Ohio State University’s computer systems.

**RESPONSE:** Plaintiff ADMITS.

46. Admit that you are employed by The Ohio State University.

**RESPONSE:** Plaintiff ADMITS.

47. Admit that in September 2023 you were employed by The Ohio State University.

**RESPONSE:** Plaintiff ADMITS.

48. Admit that You have an e-mail address of davis.1567@osu.edu.

**RESPONSE:** Plaintiff ADMITS.

49. Admit that You have used the e-mail address davis.1567@osu.edu.

**RESPONSE:** Plaintiff ADMITS.

50. Admit that You have an e-mail address of davislock1567@gmail.com.

**RESPONSE:** Plaintiff ADMITS.

51. Admit that You have used the e-mail address davislock1567@gmail.com.

**RESPONSE:** Plaintiff ADMITS.

52. Admit that You have received compensation, money, or income that You received from a claimed violation of the Telephone Consumer Protection Act, whether as a result of a demand letter, a lawsuit, or otherwise.

**RESPONSE:** Plaintiff DENIES.

53. Admit that with respect to Your devices that You have used to browse Internet websites in the months April 2023 through September 2023, You have not undertaken efforts or measures to preserve data and electronically stored information on any of them.

**RESPONSE:** Plaintiff objects to this request on the grounds that it is vague and ambiguous with respect to the phrase “undertaken efforts.” Subject to and without waiving this objection, Plaintiff DENIES that he has “not undertaken efforts or measures to preserve data and electronically stored information” on the grounds that he did not delete any relevant data.

54. Admit that You were a party to a proceeding pending before the Supreme Court of Ohio bearing Case No. 23-0455.

**RESPONSE:** Plaintiff DENIES.

55. Admit that You were a party to a proceeding pending before the Massillon Municipal Court bearing Case No. 2022-CVG-2623.

**RESPONSE:** Plaintiff DENIES.

56. Admit that You were a party to an eviction proceeding pending before the Canton Municipal Court of Stark County, Ohio.

**RESPONSE:** Plaintiff DENIES.

57. Admit that You challenged a municipal court's determination of eviction before various state entities and tribunals.

**RESPONSE:** Plaintiff DENIES.

58. Admit that You challenged a municipal court's determination of eviction before various federal entities and tribunals.

**RESPONSE:** Plaintiff DENIES.

59. Admit that You were a party to a proceeding pending before the United States Civilian Board of Contract Appeals bearing Case No. CBCA 7182.

**RESPONSE:** Plaintiff DENIES.

Date: November 8, 2024

Respectfully submitted,

/s/ Anthony Paronich  
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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that, on November 8, 2024, this document was sent electronically to the registered participants as identified on the electronic filing notice

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